

MEMO ENDORSED

LATHAM & WATKINS LLP

53rd at Third
885 Third Avenue
New York, New York 10022-4834
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

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August 12, 2020

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank, et al.*, 1:19-cv-10023

Dear Judge Failla:

On July 3, 2020, Defendants in the above-captioned matter requested the temporary sealing of a single document (filed multiple times) due to the inadvertent disclosure of information contained therein. *See* ECF Nos. 112, 113, 114, 115, 116, 121, 122. Defendants now respectfully request that the Court (i) order the ECF Clerk to permanently seal the unredacted versions of this document filed at ECF Nos. 112, 113, 114, 115, 116, 121, and 122, and (ii) accept and deem filed the identical version of that document with minimal redactions applied, attached as Exhibit 1. The reasons for this request are set forth in Defendants' *in camera* submissions to the Court, expressly incorporated by reference herein, which have already been accepted by the Court in its July 30, 2020 Order. ECF. No. 207.

Respectfully Submitted,

/s/ Christopher J. Clark

Christopher J. Clark
of LATHAM & WATKINS LLP

Encl.

cc: All Counsel of Record via ECF

Application GRANTED. The Clerk of Court is directed to place docket entries 112, 113, 114, 115, 116, 121, and 122 under permanent seal, visible to the Court and parties only.

SO ORDERED.

Dated: August 13, 2020
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE